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13

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION**

16 BERNARD J. RHATIGAN, JR and ERIN E.
RHATIGAN,

17 Plaintiffs,

18 vs.

19 EQUIFAX INFORMATION SERVICES,
20 LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS UNION, LLC;
21 and WELLS FARGO BANK, N.A. d/b/a
AMERICA'S SERVICING COMPANY,

22 Defendants.
23

Case No. 3:14-cv-01037-JST
Hon. Jon S. Tigar
Ctrm. 9

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER RE COURT ISSUED
DEPOSITION SUBPOENAS TO
CORELOGIC SAFERENT, LLC**

Action Filed: August 16, 2013
Trial Date: June 1, 2015

IT IS HEREBY STIPULATED by and between Plaintiffs BERNARD J. RHATIGAN, JR and ERIN E. RHATIGAN ("Plaintiffs") and Defendant WELLS FARGO BANK, N.A. d/b/a AMERICA'S SERVICING COMPANY ("Wells Fargo") as follows:

1. Pursuant to 15 U.S.C. § 1681b(a)(1), CoreLogic SafeRent, LLC ("SafeRent") contends that it requires a Court issued Subpoena before it will produce records which relate to the Plaintiffs. A copy of SafeRent's October 16, 2014 Objection to Wells Fargo's prior subpoena is attached hereto as Exhibit 1.

2. Plaintiffs and Wells Fargo agree that it is in their mutual interest to obtain the records as specified in Exhibit 2, attached hereto.

3. Therefore, Plaintiffs and Wells Fargo hereby stipulate and respectfully request that this Court issue the Subpoenas for Records compelling SafeRent to produce the requested documents as set forth in Exhibit 2, attached hereto.

AGREED AS TO FORM AND CONTENT:

DATED: October 22, 2014

CONSUMER LITIGATION ASSOCIATES, P.C.

By: /s/ Matthew J. Erausquin
Matthew J. Erausquin, Esq.

Attorneys for Plaintiffs Bernard J. Rhatigan, Jr. and Erin E. Rhatigan

DATED: October 22, 2014

SEVERSON & WERSON
A Professional Corporation

By: /s/ David A. Berkley
David A. Berkley

Attorneys for Defendant WELLS FARGO BANK, N.A.
d/b/a AMERICA'S SERVICING COMPANY

I, David A. Berkley, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Matthew Erausquin has concurred in this filing.

/s/ David A. Berkley
David A. Berkley

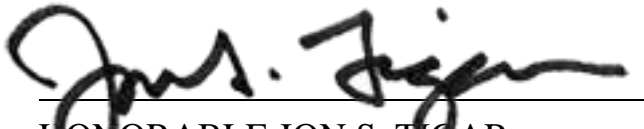
[PROPOSED] ORDER

The Court, having considered the Joint Stipulation for Court-Issued Deposition Subpoenas (“Stipulation”), and good cause existing because, in the absence of another permissible purpose, credit reporting agencies may only furnish consumer reports in response to the “order of a court” (15 U.S.C. §1681b(a)(1)), hereby:

ORDERS:

- ☒ CoreLogic SafeRent LLC is commanded to produce to Wells Fargo, and permit inspection or copying of, the documents and electronically stored information or objects contained in the subpoenas attached as Exhibit 2 to the Stipulation.

DATED: October 24, 2014


HONORABLE JON S. TIGAR
UNITED STATES DISTRICT
COURT JUDGE